

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

VERY REVEREND GEORGES F. de
LAIRE, J.C.L.,

Plaintiff,

v.

GARY MICHAEL VORIS, ANITA CAREY,
ST. MICHAEL'S MEDIA a/k/a CHURCH
MILITANT, and MARC BALESTRIERI

Defendants.

CIVIL ACTION NO. 1:21-cv-00131-JL

**AFFIDAVIT OF THE VERY REVEREND GEORGES DE LAIRE IN SUPPORT OF HIS
MOTION FOR ASSESSMENT OF DAMAGES**

I, Georges F. de Laire, make the following statements, based on my personal knowledge:

1. I am over the age of 18.
2. I was born and raised in France, and immigrated to the United States in 1983.
3. While I have now had years to try and verbalize the impact that the defamatory communications have had on me, I still find this difficult to articulate. Below I will do the best I can, but I wish to emphasize to the Court in considering my testimony that I chose to become a Priest as my life's calling. Serving in the church is my life. To have my competency, my motivations, and my character not just questioned but attacked on the Internet shook me to my core. It made me afraid. I accept the challenges that God puts in front of me. But I have had difficulty through today accepting that someone like Marc Balestrieri whom I knew and professionally dealt with could do what he did.

4. I attended St. Lawrence University in Canton NY, graduating with a Bachelor of Art in History in 1989. Subsequently, I obtained my Master's Degree in Counseling Psychology and Human Development from the same institution in 1992.

5. In 1997, I obtained a Master's in Divinity and a Master's in Biblical Theology from Saint John's Seminary in Brighton, Massachusetts.

6. In 2012, I earned my *Juris Canonici Licentia* from the Pontifical Gregorian University in Rome, Italy. I earned magna cum honors in that program.

7. I was ordained as a cleric of the Catholic Church in 1996 and have served uninterrupted since that time. At all times, I served in the Roman Catholic Diocese of Manchester, New Hampshire ("Diocese of Manchester").

8. In 2013, and in addition to leading a parish, I was promoted to the role of Judicial Vicar and the Vicar for Canonical Affairs, reporting to Bishop Libasci, who presides over the Diocese of Manchester.

9. As Vicar for Canonical Affairs, I assist Bishop Libasci in governing the Diocese of Manchester in accordance with Catholic Church teachings. In this largely administrative role, I am charged with supporting Bishop Libasci in promoting and protecting the obligations, rights and privileges of the faithful throughout the Diocese.

10. As Judicial Vicar, I, along with Bishop Libasci, form the Tribunal (i.e., judiciary) of the Diocese of Manchester. In that role, I oversee cases and trials that are brought to the Diocese Tribunal for adjudication.

11. I take great pride in my work, and for several years have worked to ensure that I am known as an honest, hard working, empathetic and fair jurist and pastor.

12. I am a member of the Canon Law Society of America, which is a professional

association dedicated to both the study and application of canon law in the Catholic Church.

13. The leadership of the Canon Law Society of America has in the past invited me to speak at its national convention.

14. On January 17, 2019, I was alerted by a colleague to a published article on churchmilitant.com entitled “Judicial Vicar Changes Dogma Into Heresy” (the “Article”). When I reviewed the Article, I identified several untrue statements about me, including but not limited to the following:

- a. de Laire is said by current work colleagues to be emotionally unstable in his role as chief canonical judge of the diocese and counselor to his bishop.
- b. de Laire is said to be desperate to repair his image and save his chances at being promoted to bishop or an official of the Roman Curia.
- c. with incompetence in canonical matters also apparently well-known and corroborated in the Roman Curia.
- d. de Laire is nicknamed in those halls [of the Roman Curia] *an incasinaro*, ‘*a troublemaker*,’ owing to his notorious botching of canonical case involving clergy and other matters.
- e. multiple independent sources in the Roman Curia say he has repeatedly botched diocesan cases and embarrassed his bishop before the Roman congregations of the curia.
- f. de Laire is currently outsourcing work product that he as a canon lawyer is being paid well by the Diocese to complete himself.
- g. said by priests and laity who currently work with him in the diocese to be a vindictive and manipulative clericalist who pines to be named a bishop or an

official of the Congregation for the Doctrine of the Faith.

h. At least three complaints against de Laire have been filed with the Holy See . . .

[t]ogether they allege corruption, abuse of office, grave violations of the law, and incompetence as a canonist.

15. These untrue and defamatory statements speak directly to the work that I do for the Diocese and the Catholic Church and cast doubt on my professionalism, and my trade.

16. These untrue and defamatory statements also constituted an attack on my credibility, which puts into question my ability to function as a priest and be taken seriously as a moral person. In order to do my job, my vocation, to the best of my ability, I must be seen as – and worked hard to ensure that I am seen as – someone who is honest, sincere, and committed to the welfare of others. The January 17, 2019 Article put all of that into question for Church Militant's thousands of readers.

17. While I did not know it at the time, I have since learned that Marc Balestrieri was the author of that article.

18. Mr. Balestrieri was known to me prior to the publication of the Article, through canon law matters that were brought before the Diocese of Manchester, New Hampshire, and through other canon law matters with which I was involved, as was Mr. Balestrieri.

19. Mr. Balestrieri was also a member of the Canon Law Society of America, and I had interacted with him through that organization.

20. I was further aware, in January of 2019, that Mr. Balestrieri was representing the St. Benedict Center in its dispute with the Diocese and the Catholic Church, which was one of the matters discussed in the Article.

21. Following the publication of the article, I reviewed the comments section of

churchmilitant.com, and saw that several of churchmilitant.com's readers believed the false statements to be true, much to my dismay.

22. For example, I observed that a commentator who identified himself as "Clifton Webb" stated that members of the clergy "are saying his competence is troubling" and said I had "attacked" people in my position. See, e.g., Jan. 17, 2019 article with comments, attached hereto as Exhibit A.

23. I read that another commentator identified as "squire98," stated "[a]rrogance, insolence and intentional ignorance are some of the hallmarks of an unduly ambitious person. He seems to qualify for the grade. In the priesthood, this can mean putting aside dogma for the sake of heresy in order to grab a seat at the head of the table." See Exhibit A.

24. I read another comment authored by someone who identified as "Dan Knight", "Botched? ... or deliberately mangled. Circumstantially, it would appear that Father Georges de Laire, the 'canon' lawyer is really just a 'fixer.' Likely for the Lavendar Mafia. Just sayin' ... that's what it looks like." See Exhibit A.

25. In the aftermath of the article, I also received email communications from members of the public. See, e.g., Emails sent to Father de Laire, a true and accurate copy of which is attached hereto as Exhibit B.

26. I also had been told by my colleagues that others in the Church were making inquiries about me, my character, and the truth of the statements in the articles – because the articles succeeded in casting doubt about my character.

27. For several months after the publication of the Article – up to and including the present time, although it has dissipated somewhat as time passed – I have felt like I am walking around with a scarlet letter on my chest. I never know with any certainty what others are

thinking of me. Sometimes, I see that people look at me with uncertainty or anger. I note that people turn their eyes away from me prior to making eye contact, to avoid speaking with me. I have also been embarrassed and belittled when my colleagues and supportive network felt the need to comfort me, or reassure me.

28. While I cannot possibly know all of the people whose opinion of me was changed for the worse – or established as negative – as a result of the Article, I know that the verbiage used on the internet, as well as direct communications with me, in reaction to the Article makes clear that it is significant.

29. In addition to these impacts to my reputation and my emotional and mental state, I suffered real world threats on my person and property as a result of the Article, which served only to exacerbate the impact on my emotional, mental and physical state. For example, I received threatening voice mail messages. I also experienced a news reporter trespassing on my property – via watercraft – to take photographs of me and/or my family and property. During a service in my parish in the days following the publication of the Article, a person unknown to me appeared at my congregation during communion, and was threatening toward me, invading my personal space and attempting to intimidate me during that service.

30. As a result of what I suffered in the wake of the Article, I sought treatment from my psychiatrist, Dr. Amy Lister at the Hallowell Center in Sudbury, Massachusetts. I had been seeing Dr. Lister since 2009 for treatment of Attention Deficit Hyperactivity Disorder (“ADHD”), as well as minor anxiety and depression.

31. I spoke to Dr. Lister about the impacts of the Article on my well being on multiple occasions throughout 2019, 2020 and 2021. I spoke with her about my need to increase my medications, albeit within the parameters of my existing prescriptions.

32. I have always endeavored to manage my anxiety and depression through coping mechanisms, and to rely less on medication. As a result, in 2019, I was taking less than the prescribed dosage of my medications. After the Article was published and I suffered heightened anxiety and depression, I increased my dosages so they were closer to the prescribed amounts. This was done with the supervision and advice of Dr. Lister.

33. As a result of the Article, I suffered from anxiety, depression, sleeplessness and loss of appetite. These symptoms continued over the months and years after the Article was published. I managed these symptoms through prescription medication and prayer.

Signed under the penalties of perjury:



The Very Reverend Georges F. de Laire, J.C.L.